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December 7, 2009

Andrea Needles  
Senior Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

Re: Reply to your letter of November 4, 2009  
CU-PVF FEC ID No. C00295527

Dear Ms. Needles:

Your letter of November 4, 2009, to Kevin Allen, Treasurer, Citizens United Political Victory Fund ("CU-PVF"), has been directed to my attention for reply on behalf of Mr. Allen and CU-PVF.

You have inquired about the Amended September 2009 Monthly FEC Report covering August 1, 2009 – August 31, 2009. Your letter states that the Amended Report discloses additional disbursements totaling \$22,588 on Line 21(b) of the Detained Summary Page, which were not disclosed on the original report. You request "clarifying information as to why this activity was not disclosed on the original report."

The amount to which you refer corresponds to a \$22,588.84 disbursement to InfoCision Management Corporation on August 27, 2009 for telemarketing services, which was inadvertently left off the original report. This error was discovered during preparation of the October 2009 Monthly FEC Report and promptly reported by way of the Amended Report, which also included an itemized listing of the InfoCision payment on Schedule B.

The InfoCision payment was not included on the original report due to human error resulting from a breakdown in the committee's safeguards aimed at preventing such mistakes. First, the check for the InfoCision disbursement was written near the end of August and did not clear the bank until September. Consequently, the payment did not show up in the bank statement covering August 2009. Second, the bookkeeper missed the payment during her initial reconciliation of the bank statement because the check was not entered into her accounting system until after the reconciliation had occurred. Third, in contradiction of the

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